

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. 19-03746-JB
)	
vs.)	
)	
ZACHARIAH STANLEY JOE,)	
)	
Defendant.)	

UNITED STATES' MOTION FOR DOWNWARD ADJUSTMENT
IN DEFENDANT'S OFFENSE LEVEL

COMES NOW the United States of America, by and through Fred J. Federici, Acting United States Attorney for the District of New Mexico, and David P. Cowen, Assistant United States Attorney for said district, files this motion pursuant to U.S.S.G. § 3E1.1(b), and moves the Court for an order for a one (1) level downward adjustment of the Offense Level in sentencing the above-named defendant. As grounds, the United States provides as follows:

1. Pursuant to U.S.S.G. § 3E1.1(a), the defendant clearly has demonstrated acceptance of responsibility for this offense, and the defendant's offense level should be decreased by two (2) levels.
2. Prior to operation of U.S.S.G. § 3E1.1(b), the defendant's offense level is 16 or greater.
3. The defendant has assisted authorities in the investigation or prosecution of this matter by timely notifying authorities of the defendant's intention to enter a plea of guilty, thereby permitting the government to avoid preparing for trial and

permitting the government and the Court to allocate their resources efficiently.

4. Therefore, pursuant to U.S.S.G. § 3E1.1(b), the defendant's offense level should be adjusted downward by one (1) additional level.

WHEREFORE, the United States respectfully requests a downward adjustment in defendant's offense level of one (1) additional level for acceptance of responsibility.

Respectfully submitted,

FRED J. FEDERICI
Acting United States Attorney

/s/ electronically January 14, 2021
DAVID P. COWEN
Assistant U. S. Attorney
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I HEREBY CERTIFY that a true copy of the foregoing was provided to counsel for the defendant on the 14th day of January, 2021.

/s/
DAVID P. COWEN
Assistant U. S. Attorney